

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

State of Minnesota, by its
Attorney General Lori Swanson,

Civil File No. 12-145 RHK/JJK

Plaintiff,

v.

AFFIDAVIT OF DONALD WILLIAMS

Accretive Health, Inc.,

Defendant.

Donald Williams, being first duly sworn on oath, state as follows:

1. My name is Donald Williams and I am 72 years old. I live in Rosemount, Minnesota with my wife, May Ann. We have been married for 44 years. We have four children and seven grandchildren. I started my career as an over the road truck driver. I drove eighteen wheeler semi-trucks all across the country hauling everything from food products to soap. I hauled products to virtually every state in the United States, other than a handful of states in the Northeastern part of the country. After driving trucks, I became a bus driver. I am now retired. In my retirement, I work part-time driving a bus in the Hastings area for senior citizens and persons with special needs, making sure they get to places they need to go. My wife and I love spending time with our grandchildren. Three of our children live nearby in Apple Valley and the fourth lives in Iowa. Our kids will drop our grandchildren off at our home, and we love having them with us. We pick up one of our grandchildren, Sarah, from school once a week and babysit her. I like to stay busy and find my work with senior citizens and persons with special needs very

rewarding. May was a nurse for 49 years before she recently retired. She graduated from the nursing program at Swedish Hospital. Most recently May was a nurse at Fairview. She worked at Fairview for 20 years, ending as a triage and internal medicine nurse. She retired a year ago and now volunteers three days a week at a school. She helps in the library as well as helps 1st graders with their reading.

2. On October 27, 2010, I was having trouble sleeping. I woke up around 4:00 a.m. with a strong pain in my abdomen. I called in sick to work around 5:00 a.m. I tried throwing up but was just dry heaving. Around 6:30 a.m. May Ann took me to Fairview Ridge's emergency room. I had a sharp pain in my abdomen and was feeling very ill. I checked in at the front desk and a nurse took my blood pressure, which was really high. Right after that, I was taken to a patient exam room where I took off my clothes and put on a hospital gown. I then laid down in a bed. Nurses entered my room and started an IV on one arm, hooked me up to a blood pressure monitor on the other arm, and attached a temperature monitor to my finger.

3. As soon as the IV started, I began to throw up. A nurse quick got me a bag to throw up in. I was then given some morphine through the IV to settle down. After I was injected with morphine, a doctor and two nurses put a tube down my throat to begin draining my stomach. I was feeling dizzy and sleepy from the morphine. Because the tube was in my mouth, it was difficult to speak. I was then wheeled in my bed to another room where they took a CT scan to determine whether I had a bowel obstruction, which can be life threatening. After the CT scan, they transferred me back to my patient room.

4. When I got back to my room, I was all alone waiting for the CT scan results. I was still hooked up to the IV, the blood pressure monitor, and had a tube down my throat draining my stomach. A woman then came in. She was not wearing a badge and was in business-like clothes. She said I had a \$50 co-pay and she needed to collect it from me now. At first, I resisted but every time I said no, she insisted I needed to pay right now. I felt like she might say at any moment that I wasn't going to receive any more treatment until I paid her. Finally, not knowing what else to do, I agreed to pay and said my debit card was in my pants. The woman grabbed my pants and set them on my chest. I removed my debit card from my pants and gave it to her. She left the room, ran my card, and then came back and gave me back my debit card and a receipt. She then took my pants and put them back where she had taken them from. The woman then left.

5. Around 10 or 11 a.m., the doctors concluded that I had a bowel obstruction and told me I had to stay in the hospital. They then wheeled me in the bed to a patient room at Fairview Ridges hospital. When I got to this new patient room, nurses hooked me back up to an IV, a blood pressure monitor, and I still had the tube inserted down my throat to drain my stomach. I was still feeling loopy from the effects of the morphine they had given me in the emergency room.

6. Once I was all settled in my room and alone, a second woman without a badge and dressed in business-like clothing entered my room. She said that now I was admitted to the main hospital, I owed a \$150 co-pay that I needed to pay right now. By this point I was fed up. I told the woman that my insurance will take care of it and that I would not pay anything now. The woman was insistent that I pay now. I told her to


leave, and almost pushed the nurse-button to get them to make the person leave. Eventually, the woman finally did go away.

7. I ended up being in the Fairview Ridges hospital for ten days. I waited three days for the bowel obstruction to clear by itself. It did not, and I had to have surgery. After the surgery there were complications, so I was held over for two additional days.

8. It's not right that I was badgered for money as I lay sick and ill. I felt trapped and that I had no choice to pay money even though I knew it didn't seem right. I want these practices to stop so that when a person is facing severe pain or a serious treatment they are treated with more dignity and respect.


DONALD WILLIAMS

Subscribed and sworn to before me
this 4 day of May,
2012.


Notary Public

